

Application No. : 10/627,942
Filed : July 25, 2003

REMARKS

Claims 1-6, 15-20, and 35-46 were pending in the application. By this paper, Applicant has amended Claims 1, 5, 15, 19, 35, 41 and 45, and added new Claims 48-56. Hence, Claims 1-6, 15-20, 35-46, and 48-56 are presented for examination herein.

Claim Objections

By this paper, Applicant has amended Claims 1 and 35 to further clarify them, and has also corrected the antecedent basis in Claim 5, thereby overcoming all objections listed in Par. 2 of the Office Action.

§102 Rejections

Claim 1 - Per Par. 4 of the Office Action, independent Claim 1 was rejected under Section 102(b) as being anticipated by U.S. Patent No. 5,546,282 to Hill et al. ("Hill").

By this paper, Applicant has amended Claim 1 to include limitations relating to the recited plurality of ports comprising a port of a first type and a port of a second type, the first and second types each having different electrical interface configurations.

Moreover, Claim 1 has been amended to add limitations relating to the recited backplane element comprising a substantially unitary and removable component from the assembly. Support for these amendments is replete throughout Applicant's specification.

Applicant submits that Hill in no way appears to teach or suggest (i) a plurality of ports comprising a port of a first type and a port of a second type, the first and second types each having different electrical interface configurations; and (ii) a backplane element which comprises a substantially unitary and removable component.

Accordingly, Applicant submits that Claim 1 as amended herein is novel and non-obvious over Hill, and defines patentable subject matter.

Claim 15 - Per Par. 5 of the Office Action, independent Claim 15 was rejected under Section 102(e) as being anticipated by U.S. Patent No. 6,485,192 to Plotts et al. ("Plotts"). The Examiner contends that Plotts discloses: "*a connector cable (62), said cable electrically mated to*

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a pigtail connector (163); a third multi-terminal connector (front connector of the housing 120) adapted to interface with terminals of an electronics insert element associated with said backplane element; and an interface element (board or substrate 80) disposed electrically between said third connector and said first, second, and pigtail connectors.” Applicant

5 respectfully disagrees.

It should be first noted that there was substantial ambiguity in the Office Action as to what the Examiner is calling the “*front connector of the housing 120*” as according to Plotts. However, under all reasonable interpretations as to what might be considered the “*front connector of the housing 120*,” Plotts does not teach or suggest all of the elements of Applicant’s

10 Claim 15.

If, by “*front connector of the housing 120*” the Examiner is referring to a connector located on the side of the optical assembly 120 of Plotts opposite the side where the optical connector portions 36 are located, then the board or substrate 80 (corresponding to the interface element) is not electrically between the front connector of the housing 120 (corresponding to the

15 third multi-terminal connector), the optical connector portions 36 (corresponding to the first and second multi-terminal connector) and the coupling housing 163 (corresponding to the pigtail connector). Please note that Applicant has specifically claimed “*an interface element disposed electrically between said third connector and said first, second, and pigtail connectors.*”

If, on the other hand, by “*front connector of the housing 120*” the Examiner is referring to

20 the interface for optical connector 62 located on the side of substrate 80 opposite the side where the pair of cavities 164 are located (thus, attaching the optical connector portions 36 to the cavities 164 and forming a new “*front connector of the housing 120*”), then the Examiner is necessarily calling two elements as the same element (namely, Applicant’s electronics insert element and Applicant’s connector cable). For if the optical connector 62 in Plotts is

25 “electrically mated” to pair of cavities 164 via the interface on the opposite side of substrate 80, that same interface cannot reasonably be said to be a “third multi-terminal connector adapted to interface with terminals of an electronics insert element” unless the optical connector 62, apart from being the connector cable, is also the electronics insert element. Thus, applicant respectfully traverses the Examiner’s ground for rejection.

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Notwithstanding this traversal, Applicant has hereon amended Claim 15 to include limitations relating to the recited third multi-terminal connector that interfaces with terminals of an electronics insert element associated with said backplane element.

Applicant submits that Plotts in no way appears to teach or suggest a third multi-terminal connector that interfaces with terminals of an electronics insert element.

Accordingly, Applicant submits that Claim 15 as amended herein is novel and non-obvious over Plotts, and defines patentable subject matter.

Claim 16 - Per Par. 5 of the Office Action, dependent Claim 16 was rejected under Section 102(e) as being anticipated by Plotts. The examiner contends that Plotts discloses: "said first multi-terminal connector (36) is adapted for use as a plain old telephone system (POTS) signal interface; said second multi-terminal connector is adapted for use as an outside plant interface; and said pigtail connector is adapted to provide electrical communication with a DSL access multiplexer (DSLAM)." Applicant respectfully disagrees.

Plotts concerns an optical array interface system that provides precision alignment for optical signals. It does not in any way Applicant can see concern a plain old telephone system (POTS) or a digital subscriber line access multiplexer (DSLAM). There appears to be nothing in the Plotts specification which teaches or suggests that the disclosed device is intended to or adapted to being used with a POTS or DSLAM. **The Examiner has not pointed to anything specifically in the Plotts specification which supports such an assertion, and hence Applicant requests that the Examiner do so.**

Accordingly, Applicant submits that Claim 16 is novel over Plotts and defines patentable subject matter.

Claim 19 - Per Par. 4 of the Office Action, independent Claim 19 was rejected under Section 102(b) as being anticipated by Hill. By this paper, Applicant has amended Claim 19 to include limitations relating to the recited first electrical connector with a first electrical interface configuration, along with the recited plurality of second electrical connectors each having a second electrical interface configuration; wherein the second electrical interface configuration is different than the first electrical interface configuration.

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Moreover, Claim 19 has been amended to add limitations relating to the recited backplane assembly comprising a substantially unitary and removable component. Support for these amendments is replete throughout Applicant's specification.

Applicant submits that Hill in no way appears to teach or suggest (i) a plurality of second
5 electrical connectors each having a second type of electrical interface configuration, the second type of electrical interface configuration being different than the first type of electrical interface configuration, and (ii) a backplane assembly comprising a substantially unitary and removable component.

Accordingly, Applicant submits that Claim 19 as amended herein is novel and non-
10 obvious over Hill, and defines patentable subject matter.

Claim 35 - Per Par. 4 of the Office Action, independent Claim 35 was rejected under Section 102(b) as being anticipated by Hill. By this paper, Applicant has amended Claim 35 to include limitations relating to the recited plurality of ports comprising a port of a first type and a
15 port of a second type, the first type and second type each having different electrical interface configurations.

Moreover, Claim 35 has been amended to add limitations relating to the recited plurality of backplane elements each comprising a substantially unitary and removable component. Support for these amendments is replete throughout Applicant's specification.

Applicant submits that Hill in no way appears to teach or suggest (i) a plurality of ports
20 comprising a port of a first type and a port of a second type each having different electrical interface configurations, and (ii) a plurality of backplane elements each comprising a substantially unitary and removable component.

Accordingly, Applicant submits that Claim 35 as amended herein is novel and non-
25 obvious over Hill, and defines patentable subject matter.

Claim 41 - Per Par. 5 of the Office Action, independent Claim 41 was rejected under Section 102(e) as being anticipated by Plotts. Applicant respectfully traverses the Examiner's rejection of Claim 41 for reasons similar to those mentioned above with respect to Claim 15.

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Notwithstanding this traversal, Applicant has amended Claim 41 to include limitations relating to the recited third multi-terminal connector that interfaces with terminals of an electronics insert element associated with said backplane element.

Moreover, Claim 41 has been amended to add limitations relating to the recited connector
5 disposed on the distal end of the cable does not mate with any of the first, second, and third multi-terminal connectors. Support for the foregoing amendments is replete throughout Applicant's specification.

Applicant submits that Plotts in no way appears to teach or suggest (i) a third multi-terminal connector that interfaces with terminals of an electronics insert element, or (ii) a
10 connector disposed on the distal end of a cable that does not mate with any of the other recited first, second, and third multi-terminal connectors.

Accordingly, Applicant submits that Claim 41 as amended herein is novel and non-obvious over Plotts, and defines patentable subject matter.

15 **Claim 42** - Per Par. 5 of the Office Action, dependent Claim 42 was rejected under Section 102(e) as being anticipated by Plotts. The Examiner contends that Plotts discloses: "*said first multi-terminal connector (36) is adapted for use as a plain old telephone system (POTS) signal interface; said second multi-terminal connector is adapted for use as an outside plant interface; and said pigtail connector is adapted to provide electrical communication with a DSL*
20 *access multiplexer (DSLAM).*" Applicant respectfully disagrees.

Plotts concerns an optical array interface system that provides precision alignment for optical signals. It does not to Applicant's reading concern the plain old telephone system (POTS) or a digital subscriber line access multiplexer (DSLAM). There appears to be nothing in the Plotts specification which teaches or suggests that the disclosed device is intended to or adapted
25 to being used with a POTS or DSLAM. **The Examiner has not pointed to anything specifically in the Plotts specification which supports such an assertion, and hence Applicant requests that the Examiner do so.**

Accordingly, Applicant submits that Claim 42 is novel and non-obvious over Plotts and defines patentable subject matter.

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Claim 45 - Per Par. 4 of the Office Action, independent Claim 45 was rejected under Section 102(b) as being anticipated by Hill. By this paper, Applicant has amended Claim 45 to include limitations relating to the recited first electrical connector having a first type of electrical interface configuration, along with the recited plurality of second electrical connectors each
5 having a second type of electrical interface configuration different than the first type of electrical interface configuration.

Moreover, Claim 45 has been amended to add limitations relating to the recited backplane assembly comprising a substantially unitary and removable component from said housing assembly. Support for these amendments is replete throughout Applicant's specification.

10 Applicant submits that Hill in no way appears to teach or suggest (i) said plurality of second electrical connectors each having a second type of electrical interface configuration different than a first type of electrical interface configuration, and (ii) a backplane assembly comprising a substantially unitary and removable component.

Accordingly, Applicant submits that Claim 45 as amended herein is novel and non-
15 obvious over Hill, and defines patentable subject matter.

§103 Rejections

Applicant respectfully submits that all Section 103 claim rejections (i.e., dependent Claims 4, 6, 17-18, 38, 40, and 43-44) per Pars. 6-9 of the Office Action) are rendered moot
20 based on the foregoing amendments and arguments. Accordingly, Applicant submits that each of the foregoing claims are also novel and non-obvious over the art of record.

New Claims

25 By this paper, Applicant has added new Claims 48-56, which relate generally to the subject matter of the other pending claims. Applicant submits that each of these new claims is fully supported by the specification, adds no new matter, and is both novel and non-obvious over the prior art including Plotts and Hill.

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Other Remarks

Applicant hereby specifically reserves the right to prosecute claims of different or broader scope in a continuation or divisional application.

5 Applicant notes that any claim cancellations or additions made herein are made solely for the purposes of more clearly and particularly describing and claiming the invention, and not for purposes of overcoming art or for patentability. The Examiner should infer no (i) adoption of a position with respect to patentability, (ii) change in the Applicant's position with respect to any claim or subject matter of the invention, or (iii) acquiescence in any way to any position taken by the Examiner, based on such cancellations or additions.

10 Furthermore, any remarks made with respect to a given claim or claims are limited solely to such claim or claims.

If the Examiner has any questions or comments which may be resolved over the telephone, he is requested to call the undersigned at (858) 675-1670.

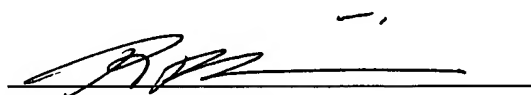
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Respectfully submitted,

GAZDZINSKI & ASSOCIATES

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By:


Robert F. Gazdzinski
Registration No. 39,990
11440 West Bernardo Court, Suite 375
San Diego, CA 92127
Telephone No.: (858) 675-1670
Facsimile No.: (858) 675-1674

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